



DATE: 5-29-85  
TO: Division File  
FROM: James J. Jones, Peoria, DLPC  
SUBJECT: ROCK ISLAND/EXPORT PACKAGING  
LPC #1610650013

RECEIVED  
JUL 09 1985  
EPA-DLPC

Export Packaging Company, Inc. uses 1, 1, 1 Trichloroethane to clean parts it paints for various customers. This is a cold cleaning process and creates waste with the remains of Trichloroethane, oil, cutting fluids, and dirt. This waste has been determined to be hazardous by EPA definition. This facility has no foreseeable plans to close their painting operation or to cease the cleaning operation which produces the waste 1, 1, 1 Trichloroethane. This facility is regulated as a generator of hazardous waste.

On Wednesday, May 15, 1985, I conducted an ISS inspection on this facility. I interviewed Mr. Dave Coopman, Vice President--Marketing. A review of the manifest procedures and waste analysis was conducted. Mr. Coopman appeared to understand the manifest requirements and the significance of making a waste determination of their waste streams, as their manifest system and waste analysis appeared to be up to standards.

I was given a tour of the facility by Mr. Coopman. In the area of Pre-transport requirement, I observed the facilities failure to put waste accumulation date(s) on containers. Their contingency plan failed to describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes.

One drum of gun cleaner waste was put in storage without making a waste determination of this waste. I was told that a sample of this waste had been sent to Beling Laboratories on 5-7-85. Mr. Coopman also failed to submit his Annual Report to the Director, according to Hope Wright, LPC, Division Office. All of these problems were discussed with Mr. Coopman and are addressed in the CIL. Mr. Coopman said that he would resolve the problems.

JJJ/ds

EPA Region 5 Records Ctr.



323924